

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MILLENNIUM COMMERCE, LLC

Plaintiff,

v.

FIRST DATA CORPORATION

Defendant,

Civil Action No. 2:17-cv-83

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT
BETWEEN PLAINTIFF MILLENNIUM COMMERCE, LLC AND DEFENDANT
FIRST DATA CORPORATION.**

Plaintiff Millennium Commerce, LLC. (“Millennium”), and defendant First Data Corporation. (“First Data”) (collectively, “the Parties”) file this Joint Motion to Stay All Deadlines and Notice of Settlement. All matters in controversy between the parties have been settled in principle, and the Parties wish to conclude this matter without burdening the Court with any additional filings and without incurring unnecessary expense. Accordingly, the Parties respectfully request that the Court stay all remaining case deadlines with respect to Defendant First Data for thirty (30) days to allow the Parties to finalize settlement and file the appropriate dismissal papers. The Parties state that good cause exists for granting this Joint Motion, and this Joint Motion is not filed for purposes of delay, but so that justice may be served.

WHEREFORE, the Parties respectfully request that the Court enter the Proposed Order submitted with this Joint Motion as set forth above, and grant the Parties any such other and further relief to which they are entitled.

Dated: April 10, 2017

/s/ Ryan E. Hatch

Law Office of Ryan E. Hatch
CA State Bar No. 235577
13323 W. Washington Blvd., Suite 100
Los Angeles, CA 90066
Tel. 310-435-6374
Email: ryan@ryane hatch.com

*Attorney for Plaintiff Millennium Commerce,
L.L.C.*

/s/ J.R. Johnson

J. Stephen Ravel
Texas State Bar No. 16584975
J.R. Johnson
Texas State Bar No. 24070000
KELLY HART & HALLMAN LLP 303
Colorado, Suite 2000
Austin, Texas 78701
Tel. (512) 495-6429
Fax (512) 495-6401
Email: steve.ravel@kellyhart.com

Travis L. Clardy
Texas State Bar No. 04268020
KELLY HART & HALLMAN LLP
209 East Main Street
Nacogdoches, Texas 75961
Tel: (936) 564-2500
Fax: (936) 564-2507
Email: travis.clardy@kellyhart.com

*Attorneys for Defendants First Data
Corporation and Clover Network, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this April 10, 2017 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile, and/or first class mail on this date.

/s/ Ryan E. Hatch
Ryan E. Hatch